

1
2
3
4
5
6
7
8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 HYDREON CORPORATION, a
11 Minnesota corporation,

12 Plaintiff,

13 v.

14 JC BROTHERS INC., a California
corporation,

15 Defendant.

16 AMAZON.COM, INC.

17 Garnishee
18

Case No. 2:17-mc-00011 RSL

APPLICATION/AFFIDAVIT FOR WRIT
OF GARNISHMENT

19 State of Washington)

20 County of King) ss.

21 I, Drew F. Duggan, declare under oath as follows:

22 1. As attorney for the above-named plaintiff, I am making this application for
23 a writ of garnishment on behalf of plaintiffs/ judgment creditors Hydreion Corporation a
24 Minnesota corporation.

25 2. Submitted herewith is the fee required by RCW 36.18.020(10) or
26 RCW 6.27.060, payable to the clerk of the above-entitled court.

APPLICATION/AFFIDAVIT FOR WRIT OF
GARNISHMENT - 1

4844-7363-3856.1
567620.0001

MILLER NASH GRAHAM & DUNN LLP
ATTORNEYS AT LAW
T: 206.624.8300 | F: 206.340.9599
PIER 70
2801 ALASKAN WAY, SUITE 300
SEATTLE, WASHINGTON 98121

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

I. APPLICATION

1.1 Plaintiff has a judgment wholly or partially unsatisfied, against the defendant, JC Brothers Inc. The Judgment was entered November 21, 2016 in the U.S. District Court Minnesota and was registered in the U.S. District Court, Western District of Washington at Seattle, on December 22, 2016 from which the writ is being sought. (Copy of Judgment attached hereto as Ex. A.)

1.2 The amount alleged to be due is the balance of the judgment or amount of claim, \$200,000.00 plus interest and estimated garnishment costs as indicated in the writ.

1.3 Plaintiff has reason to believe, and does believe, that Amazon.com Inc. (Garnishee), whose business location is 410 Terry Street N. Seattle, WA is:

[] indebted to the defendant in amounts exceeding those exempted from garnishment by any state or federal law; or

[X] the garnishee has possession or control of personal property or effects belonging to the defendant which are not exempted from garnishment by any state or federal law.

1.4 The garnishee [] is [X] is not the employer of the defendant.

II. CERTIFICATION

I CERTIFY under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

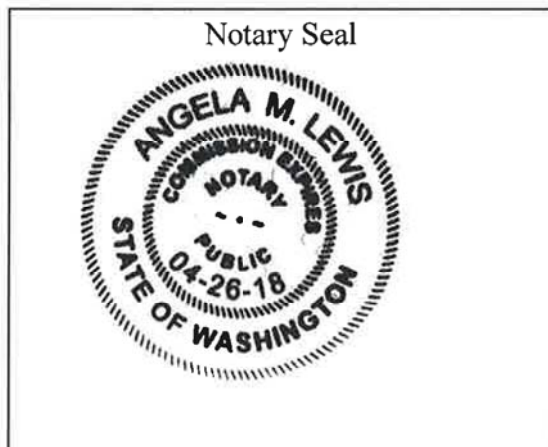
1 DATED this 1 day of February, 2017.

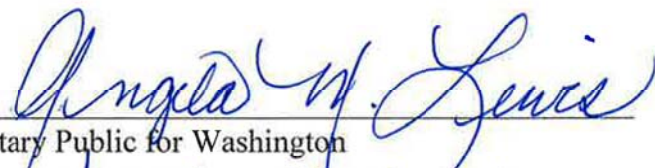
2 MILLER NASH GRAHAM & DUNN LLP

3
4 
5 Drew F. Duggan
6 WSB No. 50796
7 drew.duggan@millernash.com
8 206.624.8300

9 Attorneys for Plaintiff
10 HYDREON CORPORATION, a Minnesota
11 corporation

12 Signed and sworn to/affirmed before me Feb 1st, 2017, by Drew F. Duggan.



21 
22 Notary Public for Washington
23 Angela M. Lewis
24 Name of Notary
25 My appointment expires: 4.26.18
26